

Senior Leadership Team – minutes

25 March 2019

Details of attendees are provided at the end of the minutes.

1. Introductions and apologies

Apologies for absence were received from Elizabeth Denham, James Dipple-Johnstone, Steve Eckersley, Simon McDougall, Robert Parker and Steve Wood.

2. Matters arising from the previous meeting

Minutes

The minutes of the previous meeting were agreed as an accurate record.

Actions and decisions

Chris Braithwaite provided an update on outstanding actions from the previous meeting.

3. Directorate Business Plans – Operations Executive Directorate

The meeting considered issues related to the Operations Executive Directorate Business Plan.

4. Data Protection Casework and review – volume and plan

Issue

SLT discussed how demand for its complaints service could be most effectively met. It discussed the potential impact on DP casework volumes of increased productivity among DP staff as they became more experienced. SLT also discussed the potential benefits of the proposed new IT solutions which could reduce premature casework.

Decision

Potential productivity gains and benefits from IT solutions should form part of future proposals regarding DP casework volumes.

5. ICO strategic narrative

Issue

Su Bansal attended the meeting to present the ICO strategic narrative to increase staff's understanding and recognition of the Information Rights Strategic Plan (IRSP) and their contribution towards achieving the IRSP. SLT welcomed the proposed narrative.

6. Arrangements for the decision and calculation of Administrative Fines under the GDPR, (DPA18), NIS and PECR

Issue

SLT sought clarification regarding whether the role of the proposed panel was to make decisions or recommendations. It was confirmed that the panel would make recommendations to the Commissioner as to a range of fine it would consider to be appropriate. The panel would not fetter the Commissioner's regulatory discretion.

It was also confirmed that the panel members would be subject to the provisions within the DPA18 regarding confidentiality in relation to action being considered by the Commissioner.

Decision

These matters should be integrated into the report.

Issue

SLT discussed the options set out within the report, subject to the comments above.

Decision

SLT agreed that option 3 set out within the report, subject to the comments above.

SLT agreed that this proposal should be put to Executive Team for formal approval. When being put forward for approval, for completeness the report should also include an option of no panel, to ensure that option is considered.

Actions

Chris Braithwaite to facilitate the report on the decision and calculation of administrative fines being approved by Executive Team. Due date: 9/4/19

7. Scheme of delegation

Issue

Louise Byers presented an update on progress on development of the ICO's consolidated scheme of delegation, which was noted by SLT. The

report set out that the target date for completion of the scheme of delegation was

Actions

James Moss and Emma Bate to consider the external legal advice required to provide assurance on the regulatory action aspects of the scheme of delegation, once completed. Due date: TBC

8. Risk and opportunity register

Issue

SLT considered the updated corporate risk register.

Decision

The proposed updates to the risk register were agreed.

Issue

Louise Byers explained that Corporate Governance would provide SLT with a single document setting out each of the relevant templates and the scheduling of regular updates required from SLT members.

Action

Chris Braithwaite to provide SLT with a document setting out the relevant corporate governance templates and scheduling of regular updates required from SLT members. Due date: 9/4/19

9. Data Protection Practitioners Conference – 8 April 2019

Issue

Robert Parker attended the meeting to provide an update on plans to the Data Protection Practitioners Conference.

10. Management Board – 7 May 2019 – draft agenda

Decision

SLT noted the Management Board agenda for 7 May 2019, subject to the proposed addition of the report on arrangements for the decision and calculation of Administrative Fines under the GDPR (DPA18), NIS and PECR.

11. SLT work programme

Issue

SLT noted the work programme for future meetings.

12. Any other business

Issue

The key messages from this meeting for ICO staff are:

- the productivity efficiencies which can be achieved throughout 2019/20 and the evaluation of the ICO's priorities in the short, medium and long term;
- the proposals for the advisory panel on major regulatory action under GDPR, NIS and PECR; and
- the plans for the Data Protection Practitioners Conference.

Decision

Andy White will record the video on the key messages from this meeting.

Attendance

Members

Paul Arnold (Chair)	Deputy Chief Executive Officer (Executive Director – Corporate Strategy and Planning)
Jonathan Bamford	Director of Strategic Policy (Domestic)
Emma Bate	Director of Legal Services (Policy and Commercial)
Gill Bull	Director of FOI Complaints and Compliance
Louise Byers	Director of Corporate Affairs and Governance
Mike Fitzgerald	Director of Digital, IT and Customer Services
Suzanne Gordon	Director of Data Protection Complaints and Compliance
Andrew Hubert	Director of Resources
Ian Hulme	Director of Regulatory Assurance
James Moss	Director of Legal Services (Regulatory Enforcement)
Andrew White	Director of High Profile Investigations and Intelligence
Amanda Williams	Director of Strategic Policy (Parliament and Government Affairs)

Attendees

Robert Parker	Head of Corporate Communications
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Secretariat

Chris Braithwaite

Senior Corporate Governance Manager